



*Environmental Engineering, Civil Engineering  
Forensic Engineering, Construction Services*

**ADMINISTRATIVE CONSENT ORDER  
PROGRESS REPORT  
OCTOBER - DECEMBER 2019**

**Former United Shoe Machinery Division North Parcel  
181 Elliott Street  
Beverly, MA 01915**

*Prepared for:*

Cummings Properties, LLC  
200 West Cummings Park  
Woburn, MA 01801

*Prepared by:*

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**January 13, 2020**

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## 1.0 INTRODUCTION

This Progress Report was prepared to detail the field and sampling activities associated with the former United Shoe Machinery (USM) Division North Parcel at 181 Elliott Street in Beverly, Massachusetts (also referred to as the “Site”). Actions completed in this report relate to the approved Written Proposal/Sampling and Analysis Plan Revision 2 (“SAP”) for the Site dated September 29, 2017. Refer to the attached **Figure 1** for the site locus and **Figure 2** for the site plan.

This Site has been identified in the RCRA 2020 Corrective Action Universe list established by the United States Environmental Protection Agency (EPA). By the year 2020, EPA and the authorized states plan to have largely completed the work of implementing final remedies at all facilities requiring Corrective Action. This Site is listed under site number MAD 043415991 as USM Machinery Division. As part of the RCRA 2020 program, EPA is overseeing an audit of the historical remedial actions conducted at the property by the former property owner, Stanley Black & Decker. EPA Region 1 has been working with the current owner’s representative, Cummings Properties, LLC, on this Site since 2009, and in EPA’s opinion, more sampling data are potentially needed to, among other things, understand whether vapor intrusion may be impacting indoor air quality and posing a threat to human health.

As part of EPA’s audit and review of existing sampling data, EPA has required further examination to determine:

- whether vapor intrusion is occurring at locations identified by EPA, including buildings 100, 500, and 600;
- whether contamination exists in the Shoe Ponds that presents ecological risk to aquatic life;
- whether all underground storage tanks have been removed or properly abandoned, if there are releases to the environment from the tanks, and the nature and extent of any migration of contamination from existing tanks;
- whether residual polychlorinated biphenyl (PCB) contamination exists on the fourth floor of Building 100 (formerly occupied by the North Shore Regional Vocational School) in or proximate to the former machine shop and any other area on-site where PCBs were used/managed/released and/or identified as a contaminant of concern; and

- whether the PCB disposal areas (former chip grind shed and former ballfield area) meet the requirement of 40 CFR § 761.61 and the January 9, 1997 approval letter from EPA, including but not limited to the following:
  - (1) required protective cover,
  - (2) required cover maintenance,
  - (3) required AUL documentation, and
  - (4) appropriate documentation to verify that stabilized PCB contaminated soils were placed at least one foot above the high water table so that no migration of PCBs to groundwater is occurring.

These requirements were set forth in an Administrative Consent Order (ACO) between EPA and Cummings Properties, LLC with an effective date of April 13, 2017.

Specifically, this report documents actions that have taken place in October-December 2019 in furtherance of the work required in the ACO. Work was done in accordance with the SAP, as updated September 29, 2017.

## **2.0 OCTOBER-DECEMBER 2019 ACTIVITIES**

No field sampling was performed in October-December 2019. There were no scheduled field activities based on the SAP or the Elliott Landing SAP. Due to the lack of field activities, and with EPA's prior approval, Cummings Properties, LLC did not submit monthly progress reports in November 2019 and December 2019.

Previous EPA comments (from August 18, 2019) on the Quality Assurance Project Plan (QAPP) Addendum Revision 1 for the Baseline Ecological Risk Assessment (BERA) were reviewed. Cummings requested a conference call with EPA to seek further clarification on certain EPA comments and to discuss alternative technical approaches to others. This conference call, which included EPA, Cummings Properties, LLC, and Cummings' ecological consultant, was held on October 15, 2019. After receiving the parties' summaries of the call, EPA prepared a final memorandum to memorialize the parties' discussions and agreements. This final memorandum was issued on December 10, 2019.

## **3.0 NEXT SCHEDULED ASSESSMENT ACTIVITIES**

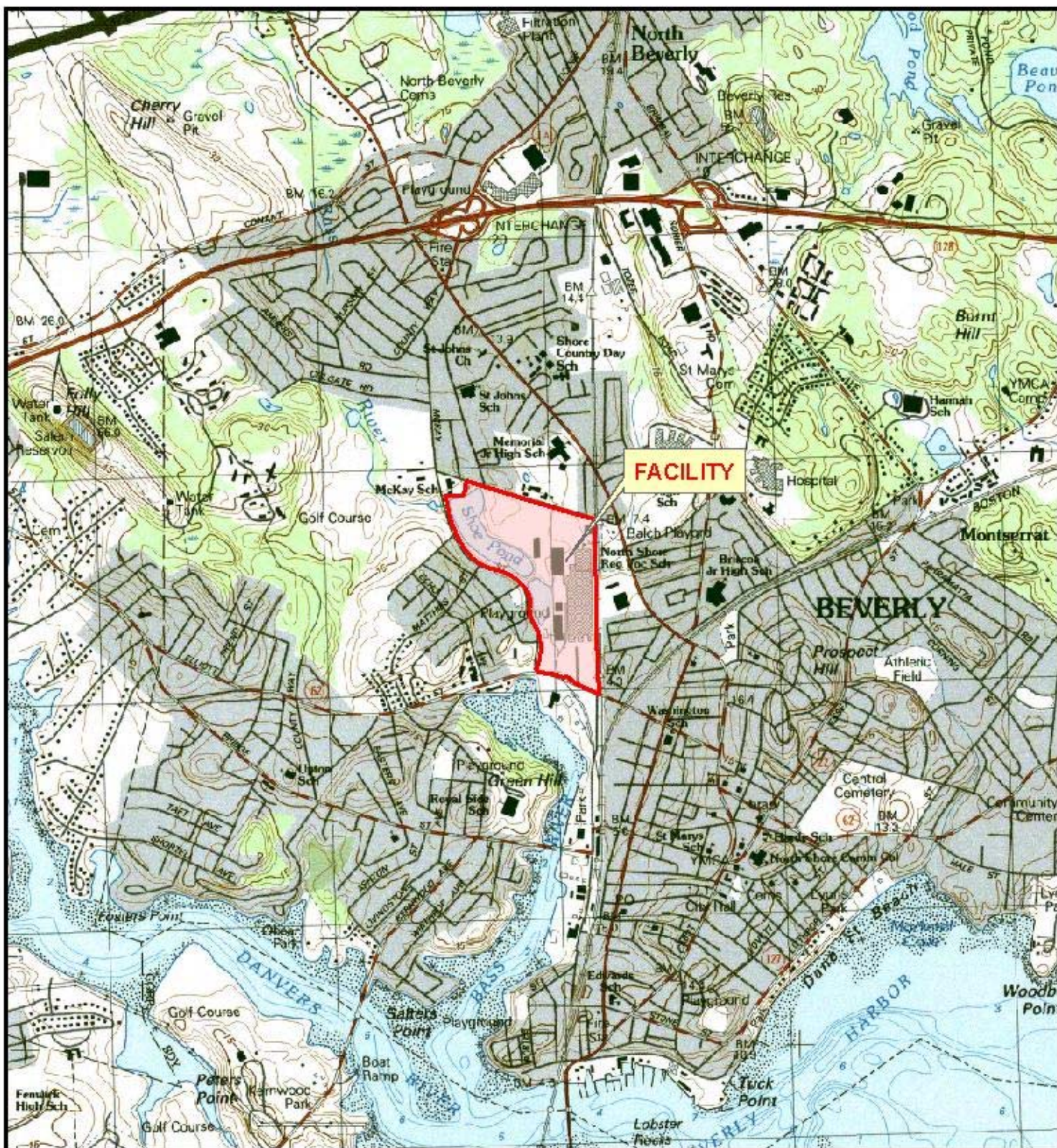
There are currently no assessment activities scheduled for January 2020. A second QAPP Addendum Revision for the BERA is in the process of being prepared and submitted to EPA. As part of this process, EPA's proposed background sediment sampling locations are currently being investigated for viability and accessibility.

## FIGURES

Figure 1 – Locus Plan

Figure 2 – Site Plan





SITE COORDINATES  
 Longitude: -70.8871 W  
 Latitude: 42.5596 N  
 UTM 4,713,634m N  
 345,086m E



Approximate Scale: 1 inch = 2,000 feet (1:24,000)

## Figure 1 - Locus Plan

Project Number: 12201  
 Client: Cummings

Created By: EAF Date: 03/15/12  
 Checked By: BH Date: 03/15/12

Former United Shoe Machinery North Parcel  
 181 Elliott Street  
 Beverly, MA

Reference: MassGIS USGS Quadrangle: SALEM and MARBLEHEAD NORTH  
 Image: M\12201\_Beverly\2012\Figures

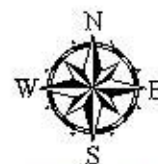




FIGURE 2

SITE PLAN

FORMER UNITED SHOE  
MACHINERY NORTH PARCEL  
181 ELLIOTT STREET  
BEVERLY MA

LEGEND

-  STABILIZED SOIL DISPOSAL AREA
-  TANKS
-  FSL-X PROPOSED WELL
-  HISTORIC PHASE II WELL

NORTH 



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NOTE:  
Locations taken from Haley & Aldrich Plan  
Dated October 30, 1997.

SCALE:	1'=125' +/-
DRAWN:	RT
CHK'D:	BAH
DATE:	3/29/17
DATE REV:	3/12/18